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11 *Representing the United States of America*

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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Case No.: 3:22-cr-00068-ART-CLB

17 Plaintiff,

18 vs.

19 **Government's Disclosure Statement**

20 TRISTON HARRIS STEINMAN,

21 Defendant.

22 Pursuant to LCR 16-1(b)(2) of the Local Rules of Practice for the District of
23 Nevada, Andrew Keenan, Assistant United States Attorney, contacted counsel for
24 defendant to discuss scheduling of discovery in the instant case. The Government has
provided this Government Disclosure Statement to defense counsel and is moving forward
with providing discovery in this matter. The Government agrees to provide discovery in the
instant case as follows:

25 **Discovery Schedule**

26 A. The Government has provided or will provide or permit the defendant to inspect and
27 copy or photograph:

- 1) All statements, documents, and objects, including audio or video
2) recordings, required to be disclosed under Rules 16(a)(1)(A)-(F),
3) Federal Rules of Criminal Procedure.
- 4) All search warrants and supporting affidavits, which relate to evidence
5) that may be offered at trial.
- 6) The Government will provide expert disclosures as required under
7) Rule 16(a)(1)(G), Federal Rules of Criminal Procedure.

8) B. The Government is unaware of any exculpatory information. The Government will
9) provide any subsequently discovered exculpatory information reasonably promptly upon
10) its discovery. The Government will provide impeachment information relating to
11) government witnesses who will testify at a pre-trial hearing, trial or sentencing sufficiently
12) in advance of the hearing, trial or sentencing to allow the hearing, trial or sentencing to
13) proceed efficiently.

14) C. The Government hereby makes any and all demands for reciprocal disclosures from
15) the defendant under Federal Rules of Criminal Procedure 12.1, 12.2, 12.3 and 16,
16) including but not limited to the following, to be provided prior to trial:

- 17) 1) All documents, objects, and reports of examination required under
18) Rules 16(b)(1)(A) and (B), Federal Rules of Criminal Procedure.
- 19) 2) All expert disclosures as required under Rule 16(b)(1)(C), Federal
20) Rules of Criminal Procedure.
- 21) 3) All notices of any defenses under Rule 12.1, Federal Rules of Criminal
22) Procedure.

4) Any summaries, charts, or calculations, which the defense intends to offer at trial.

D. The Government will no later than 5 days before trial or at such subsequent time as the Government learns any of the following information:

- 1) Disclose any summaries, charts, or calculations, which the Government intends to offer at trial.
- 2) Identify recordings, transcripts of recordings, or portions thereof, which the Government intends to offer at trial.
- 3) Disclose any reports or memoranda of interviews of witnesses the government intends to call in its case in chief.
- 4) Disclose any statements of witnesses under Title 18, United States Code, Section 3500.

E. If the Government withholds the disclosure of items subject to discovery under Federal Rule of Criminal Procedure 16 or case law or statute, it will either: 1) provide notice to the defense of its intent to withhold disclosure and describe the nature of the item and the basis for withholding disclosure; or 2) submit in camera a motion to the court for a protective order describing the nature of the item, the basis for withholding disclosure and the need for in camera review and any sealing of the record. The Government requests that, if the defendant withholds the disclosure of any such item(s), it provide such notice to the Government.

The disclosures and reciprocal disclosures set forth above apply to those objects, documents, items, and other disclosure matters that are in the possession, custody, or control of the parties at the time the obligation to disclose arises. The Government

1 recognizes that it has a continuing duty to provide disclosures up to and through trial as to
2 any matters required to be disclosed by statute, rule, or the United States Constitution.
3 Nothing in this statement is intended to create any rights for the defendant or in any way
4 restrict or expand the remedies available to the Court for any breach of any disclosure
5 obligations.

6 The Government holds itself available to make good faith efforts to confer with
7 defense counsel to resolve informally any dispute over the scope, manner and method of
8 disclosures before seeking relief from the Court.

9 DATED this 20th day of March, 2023.

10 Respectfully submitted,

11 JASON M. FRIERSON
United States Attorney

13 /s/ Andrew Keenan

14 ANDREW KEENAN
Assistant United States Attorney

15 Attorneys for Plaintiff
UNITED STATES OF AMERICA

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